

1 Patricia S. Waldeck, Nev. Bar No. 2640
2 777 N. Rainbow Blvd., Suite 270-S
3 Las Vegas, NV 89107
4 Telephone: (702) 658-6100
5 Facsimile: (702) 658-2502
6 pswaldeck@cs.com

7 Kirsten G. Scott, Cal. Bar. No. 253464 (*Admitted Pro Hac Vice*)
8 RENAKER HASSELMAN SCOTT LLP
9 235 Montgomery St., Suite 944
10 San Francisco, CA 94104
11 Telephone: (415) 653-1733
12 Facsimile: (415) 727-5079
13 kirsten@renakerhasselman.com

14 *Attorneys for Plaintiff*

15
16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 JOHN SIMMONS, SR.,
19 Plaintiff,
20 vs.
21 VERIZON MANAGEMENT PENSION PLAN,
22 Defendants.

23 Case No. 2:16-CV-00455-GMN-GWF

24 **JOINT STATUS REPORT REGARDING
25 SETTLEMENT**

26 On December 22, 2016, following a Settlement Conference with Magistrate Judge
27 George Foley, Jr., Plaintiff John Simmons, Sr. (“Simmons”) and Defendant Verizon
28 Management Pension Plan (“Plan”), reached agreement on a dollar amount to settle all claims
and causes of action in the above-referenced action. Counsel for the Plan indicated that she
would send a draft settlement agreement for Simmons’ review.

On January 13, 2017, the Plan provided Simmons with a draft agreement. After some

1 discussion and edits to the content of the agreement, Simmons and his counsel provided a signed
2 and notarized copy of the agreement on January 25, 2017.
3

4 Per the terms of the agreement, the Plan will now send Simmons a pension election form,
5 and following return of that document, the Plan will provide to Simmons the agreed-upon
6 settlement amount. The Plan estimates that this can be completed promptly. It is important to
7 Simmons that he receive the agreed-upon settlement payment before dismissing this case.
8

9 For these reasons, the parties respectfully request that the Court extend the current
10 deadline to file dismissal documents from January 30, 2017 to **February 17, 2017**, by which
11 time the parties shall dismiss the case, or file a joint case management conference statement
12 explaining why the case has not been dismissed.
13

14 Dated: January 26, 2017

Respectfully submitted,

15 RENAKER HASSELMAN SCOTT LLP

16 By: /s/ Kirsten Scott

17 Kirsten Scott

18 *Attorneys for Plaintiff*

19 Dated: January 26, 2017

Respectfully submitted,

20 LEWIS ROCA ROTHGERBER CHRISTIE LLP

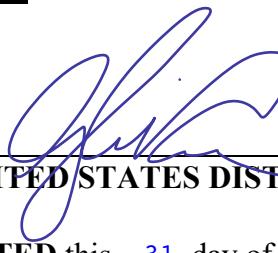
21 By: /s/ Ann-Martha Andrews.

22 Ann-Martha Andrews

23 *Attorneys for Defendant*

24 **ORDER**

25 **IT IS HEREBY ORDERED** that the
26 deadline to file dismissal documents or a
27 joint status report explaining why
dismissal documents have not been filed
is extended to February 17, 2017.


28 **UNITED STATES DISTRICT JUDGE**

DATED this 31 day of January, 2017.